

# **EXHIBIT 2**

**DECLARATION OF AKIL VOHRA**

I, Akil Vohra, pursuant to the provisions of 28 U.S.C. § 1746, hereby declare under penalty of perjury that the foregoing is true and correct:

1. I am over the age of eighteen years and make this declaration of my own personal knowledge.
2. I am the Executive Director of Asian American Youth Leadership Empowerment And Development (“AALEAD”). In that capacity, my role is to help set the vision of AALEAD and ensure the capacity and infrastructure necessary to realize AALEAD’s mission. My responsibilities include supervising AALEAD staff, who report to me during weekly meetings and provide monthly written reports of the program areas.
3. I submit this declaration in support of the brief of *amici curiae* and more generally in support of measures to reduce barriers to access to Thomas Jefferson High School for Science and Technology (“TJHSST”) and to promote equality of educational opportunities for all students.
4. Based on my personal experience with the Asian American community in Northern Virginia and my experiences as Executive Director of AALEAD; serving as the former Director of Strategic Initiatives at the White House Initiative on Asian Americans and Pacific Islanders (WHIAAPI), where I led the team that guides federal government policy on education, civil rights, bullying and harassment, data, workforce diversity, religion, language access, and My Brother’s Keeper; and my prior work with community based organizations and grassroots advocates, I believe that measures to advance opportunities for underserved students benefit all students, including underserved Asian American and Pacific Islander youth and all historically marginalized communities.

5. AALEAD's mission is to support low-income and underserved Asian American and Pacific Islander youth with educational empowerment, identity development, and leadership. Founded in 1998 with a vision to create and grow a community organization that belongs to the community, AALEAD initially served a large Vietnamese refugee and immigrant population in Washington, D.C. With changes in demographics over the years in the region, AALEAD expanded its reach and now serves a multi-ethnic Asian American and Pacific Islander community in Fairfax County, Virginia, Washington, D.C., and Montgomery County, Maryland.

6. AALEAD works to support underserved Asian American and Pacific Islander youth as well as their families and communities. The community that AALEAD serves is diverse, and includes Vietnamese, Chinese, Indian, Bangladeshi, Cambodian, Filipino, Korean, Sri Lankan, Thai, Tibetan, Afghan, Pakistani, Black, Latinx, and White families, and approximately 73% of our community members are low-income. In Fairfax County, nearly half of the youth AALEAD serves qualify for Free or Reduced Priced Meals, and a third are foreign-born.

7. AALEAD serves middle school and high school students through our afterschool, summer, and mentorship programs. AALEAD's programs provide academic and college preparation support through the Positive Youth Development approach, which engages youth in a supportive and nurturing environment. The programs also engage youth in learning about Asian American history and provides youth opportunities to explore their own identities, in addition to learning about the histories of other marginalized communities and allyship. Additionally, AALEAD's programs provide opportunities for leadership development and civic engagement, and the youth have led various efforts and campaigns, including submitting comments to the Virginia Department of Education advocating for the teaching of Asian

American history in Fairfax County Public Schools. AALEAD believes that all students, including Asian American students, benefit from learning along with students of diverse backgrounds and lived experiences and being in an educational environment that welcomes and nurtures all students.

8. AALEAD's services and advocacy also extend beyond the classroom. To better understand the needs of the communities that AALEAD serves, AALEAD regularly surveys youth in our programs about their concerns and issues affecting them. Through the surveys, AALEAD identified a critical need for mental health services, and started working with a clinical psychologist to support our youth and families, including webinars on mental health and best practices. AALEAD also provides language assistance, translated materials, and culturally appropriate communication to help families access resources and navigate the school system. Additionally, for over twenty years, AALEAD has built strong ties with our community and has served as a trusted voice and advocate for the Asian American and Pacific Islander community in front of local school boards and city councils.

9. During the on-going COVID-19 pandemic, AALEAD youth have experienced increased stress and anxiety about their own health and safety, as well as for their families and community members. Many families that AALEAD serves have experienced disruptions in income related to COVID-19. The rise in anti-Asian hate incidents and harassment have further caused frustration, fear, and distress in the community. AALEAD youth have experienced disruptions in learning and extracurricular activities, increased need for academic support, and feelings of being disconnected from teachers and peer networks that are important to their socioemotional development.

10. The middle school and high school youth that AALEAD serves reflect the diversity of the Asian American community in Fairfax County. Many underserved families that AALEAD supports are recent immigrants to the United States and are often unfamiliar with the complex school systems and the myriad requirements necessary to access various educational opportunities. Based on my knowledge and experience as Executive Director of AALEAD, I know that the families AALEAD serves value having access to the same opportunities for their youth to learn and succeed as everyone. Outreach and clear communications of the ways to access TJHSST is important to meaningfully expand access to TJHSST for the underserved families that AALEAD supports.

11. The changes to the admissions process at TJHSST have resulted in increasing the number of economically disadvantaged students (from 0.62% to 25.09%) and English language learners (0.62% to 7.09%)<sup>1</sup>; the very population served by AALEAD. Based on my knowledge and experience as Executive Director of AALEAD, I know that this increase in diversity of the student body at TJHSST is beneficial to the communities that AALEAD serves as it will increase opportunities for underserved youth and to create a more diverse learning environment that can lessen the isolation that many low-income and ELL students feel, including Asian Americans and Pacific Islanders.

12. Based on my experience and knowledge, I believe that labeling the changes to the TJHSST admissions process to reduce barriers to opportunities as “anti-Asian” is not only misleading, but obscures the diversity of the lived experiences, backgrounds, and histories of the

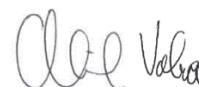
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<sup>1</sup> See *TJHSST Offers Admission to 500 Students; Broadens Access to Students Who Have an Aptitude for STEM*, (June 23, 2021), available at <https://www.fcps.edu/news/tjhsst-offers-admission-550-students-broadens-access-students-who-have-aptitude-stem>; Def.’s Br. in Opp. to Pl.’s Renewed Mot. for Prelim. Inj., ECF 64 at 15.

Asian American and Pacific Islander community in Northern Virginia, and feed into the harmful perception of the community as a monolith. Measures to reduce barriers to accessing educational opportunities benefit the underserved Asian American and Pacific Islanders communities AALEAD works with and help expand opportunities for students whose diverse experiences are too often overlooked.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington DC on September 13, 2021.



Akil Vohra